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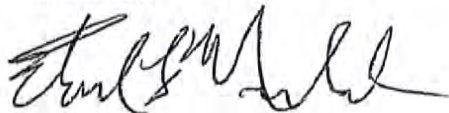
IL Pollution Control Board
John Therriault, Assistant Clerk
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, IL 60601

Re. case number R2012-023A, Sub-docket A of the Rulemaking In the Matter of: Concentrated Animal Feeding Operations (CAFOs): Proposed Amendments to 35 Ill. Adm. Code Parts 501, 502, and 504

Members of the Pollution Control Board:

The immensity of the water quality problems posed by CAFO's, as well as the hostility of large agricultural operations to reasonable water protective regulation have become ever more evident since the Illinois Pollution Control Board ordered the long debated and estimable Amendments to 35 Ill. Adm. Code Parts 501, 502, and 504 early last August. These facts underscore the already evident need for Illinois to adopt CAFO information reporting requirements that fill existing gaps in the array of specific items of information IEPA now receives from other reports, that close the gaps due to exclusion of some categories of CAFO's from the requirement to submit information at all (unregulated CAFO's), that close those gaps created by grandfathering some CAFO's out of reporting requirements (CAFO's built before 1996 and not expanded), and that address the temporal gaps due to the inability of IEPA inspectors to visit and comprehensively evaluate every CAFO even once per year. IEPA needs this information to fully comply with its requirement to complete and update the inventory of CAFO's in this state that is presumed by the Clean Water Act and specifically mandated by the USEPA in 2010 in its requirements for the State to avoid withdrawal of its administration of the NPDES program. More importantly, such reporting is the only economically viable way to collect the timely and complete information needed to assure proper management of the massive amount of animal waste produced by these facilities. It is necessary to prevent the pollution of the waters Illinois. In short, enacting a reporting program responsive to the obligation of IEPA to protect public and wildlife health in Illinois is the commonsense and the only possible logical complement to the Board's earlier efforts to assure appropriate CAFO operation in Illinois.

Respectfully,



Edward L. Michael